## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

CAMEO HOLLAND, an Individual and Next of Kin to, S.R., DECEASED

Plaintiff,

v.

CITY OF OKLAHOMA CITY,

WADE GOURLEY, individually,

COREY ADAMS, individually,

JARED BARTON, individually,

BRAD PEMBERTON, individually,

BETHANY SEARS, individually,

JOHN SKUTA, individually,

Defendants.

Case No: CIV-21-275-J

## PLAINTIFF'S RESPONSE TO DEFENDANTS BARTON AND PEMBERTON'S MOTION TO STAY CIVIL CASE

COMES NOW, Plaintiff, Cameo Holland, as the Next-Of-Kin to Minor Child S.R., Deceased, by and through counsel, Rand C. Eddy, and for her Response to Defendants, Barton and Pemberton's Motion to Stay Civil Case, states as follows:

At present Plaintiff does not object to Defendant Pemberton and Barton's request to a stay in these civil proceedings. However, in the event the criminal trial drags on Plaintiff reserves the right to request a Lift of the Stay due to her clear interest in the expeditious resolution of her case.

Quoting Defendants' brief....."if it can be easily avoided, a person who is presumed innocent should not have to pay a cost to exercise a constitutional right...while there may come a point, if the criminal case drags on"..... *Urrutia v. Montoya, 2016 WL 9777168 @ \*24 (June 29, 2016)*. Defendant's Brief page 5.

Respectfully,

s/ Rand C. Eddy

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Attorney for the Plaintiff

## **CERTIFICATE OF MAILING**

I hereby certify that on the 29<sup>th</sup> day of June, 2021, I electronically transmitted the attached document using the ECF System for filing and transmittal of a Notice of Electronic Filing to all parties currently entered of record in this matter.

s/ Rand C. Eddy
Rand C. Eddy